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FRANCISCO TRONCOSO  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 FRANCISCO TRONCOSO,

15 Defendant.  
16  
17

Case No. 1:22-cr-00143-DAD-BAM-2

**STIPULATION TO MODIFY CONDITIONS  
OF PRETRIAL RELEASE**

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
19 counsel, Assistant United States Attorney Jessica Massey, counsel for plaintiff, and Assistant  
20 Federal Defender Reed Grantham, counsel for defendant Francisco Troncoso, that the condition  
21 of Mr. Troncoso's release, previously imposed on June 13, 2022, *see* Dkt. #46, that he be  
22 released pursuant to a "\$6,000 bond to be secured by clear title to a 2008 Mercedes CT 300,  
23 owned by Guadalupe Gutierrez" be modified to remove this language and to instead state that he  
24 be released pursuant to "\$7,000 bond to be secured by clear title to a 2005 Dodge Durango,  
25 owned by Maria Lopez De Jimenez and Jose Jimenez."

26 On June 13, 2022, a detention hearing was held in Mr. Troncoso's case. *See* Dkt. 46. At  
27 the detention hearing, the Court ordered Mr. Troncoso released on various conditions. *See* Dkt.  
28 #46. One of the conditions required the posting of a "\$6,000 bond to be secured by clear title to a

1 2008 Mercedes CT 300, owned by Guadalupe Gutierrez.” Dkt. #46. However, following the  
 2 detention hearing, defense counsel and the assigned Pretrial Services Officer had additional  
 3 discussions with Ms. Gutierrez and it was determined that while Ms. Gutierrez did own the  
 4 vehicle that was to be posted—the 2008 Mercedes CT 300—she did not have the title in her  
 5 possession. Thereafter, Ms. Gutierrez indicated that her parents had agreed to post a \$7,000 bond  
 6 secured by the clear title to their vehicle, a 2005 Dodge Durango. On June 16, 2022, the assigned  
 7 Pretrial Services Officer spoke to the owners of the 2005 Dodge Durango—Maria Lopez De  
 8 Jimenez and Jose Jimenez—and confirmed their willingness to post the clear title to their vehicle  
 9 with an estimated value of \$7,000. The Pretrial Services Officer also confirmed that both Ms. De  
 10 Jimenez and Mr. Jimenez understood the consequences of serving as a surety. Following this  
 11 confirmation, the assigned Pretrial Services Officer indicated that Pretrial Services had no  
 12 objection to modifying the release condition by removing the condition requiring the posting of a  
 13 “\$6,000 bond to be secured by clear title to a 2008 Mercedes CT 300, owned by Guadalupe  
 14 Gutierrez” and replacing it with language that required the posting of a “\$7,000 bond to be  
 15 secured by clear title to a 2005 Dodge Durango, owned by Maria Lopez De Jimenez and Jose  
 16 Jimenez.”

17 In light of the above, the parties, including Pretrial Services, agree to the modification as  
 18 set forth above, and ask that the Court modify this condition. Notwithstanding the above, Mr.  
 19 Troncoso’s release will be delayed until 9:00 a.m. on the first working day after the bonds have  
 20 been posted, with the defendant released to the third-party custodian. All other terms and  
 21 conditions of Mr. Troncoso’s pretrial release, previously imposed on June 13, 2022, shall remain  
 22 in full force and effect.

23 Respectfully submitted,

24 PHILLIP A. TALBERT  
 25 United States Attorney

26 Dated: June 17, 2022

27 /s/ Jessica Massey  
 28 JESSICA MASSEY  
 Assistant United States Attorney  
 Attorney for Plaintiff

HEATHER E. WILLIAMS  
Federal Defender

Date: June 17, 2022

/s/ Reed Grantham  
REED GRANTHAM  
Assistant Federal Defender  
Attorney for Defendant  
FRANCISCO TRONCOSO

**ORDER**

The above term and condition of Mr. Troncoso's pretrial release, previously imposed on June 13, 2022, is hereby modified as set forth above. All other conditions previously imposed remain in full force and effect.

IT IS SO ORDERED.

Dated: June 21, 2022

/s/ Eric P. Gray  
UNITED STATES MAGISTRATE JUDGE